

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

THE COLEMAN COMPANY, INC.,

Plaintiff/Counterclaim Defendant,

v.

Case No. 2:20-cv-351-RCY-LRL

TEAM WORLDWIDE CORPORATION,

Defendant/Counterclaim Plaintiff,

and

CHENG-CHUNG WANG,

Counterclaim Plaintiff.

**THE COLEMAN COMPANY, INC.’S RESPONSE TO TWW’S MOTION TO SEAL
MOTION *IN LIMINE* REGARDING
COURT’S CONSTRUCTION OF “COIL” (ECF NO. 331)**

Plaintiff/Counterclaim Defendant The Coleman Company, Inc. (“Coleman”), by counsel, pursuant to Local Civil Rule 5(C), submits this response to the Motion For Leave To Seal Motion *In Limine* Regarding Court’s Construction of “Coil” For U.S. Patent No. 7,089,618 (ECF No. 331) filed by Defendant/Counterclaim Plaintiff Team Worldwide Corporation (“TWW”).

Coleman has no objection to the **UNSEALING** of the unredacted Exhibits A through D to TWW’s Memorandum in Support of its Motion *In Limine* Regarding Court’s Construction of “Coil” (ECF No. 334) and references in the Memorandum to the same. TWW states that it filed the Exhibits A through D to its Memorandum in Support of the Motion *In Limine* because those documents had been “designated by Coleman as confidential pursuant to the Protective Order.” ECF No. 332 at 2.

Coleman has previously consented to the unsealing/waived the confidentiality designations of the content of these exhibits. For example, Exhibits B and D to TWW’s Memorandum (ECF

Nos. 334-2 and -4) are excerpts from Dr. Singhose's expert report on infringement and rebuttal report on infringement of the '678 patent. But Dr. Singhose's *entire* reports are already filed publicly in the docket of this case at ECF No. 163-1 and -2, based on Coleman's earlier non-opposition to unsealing them. Similarly, the pages of Dr. Singhose's deposition transcript contained in Exhibit A (ECF No. 334-1) have been filed publicly by Coleman (*see* ECF No. 187-4) and were unsealed by order of the Court as an exhibit to TWW's motion for summary judgment (*see* ECF No. 196 at 4 (denying motion to seal Exhibit G, ECF No. 175-3)).

Exhibit C to TWW's Memorandum (ECF No. 334-2) is Appendix D to Dr. Singhose's (publicly filed) infringement report and contains the same type of information as the report in full. Coleman does not oppose unsealing this exhibit, either.

For the foregoing reasons, TWW's Motion To Seal (ECF No. 331) should be denied as there is no need to keep the documents at issue therein sealed.

Dated: December 20, 2022.

Respectfully submitted,

THE COLEMAN COMPANY, INC.

By counsel:

/s/ David B. Lacy

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 20, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record:

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